

**THE SUPERIOR COURT OF THE DISTRICT OF COLUMBIA
CIVIL DIVISION**

CAPITAL PRIDE ALLIANCE, INC.,

Plaintiff,

v.

DARREN DOLSHAD PASHA,

Defendant.

Case No. 2025-CAB-007162

PLAINTIFF'S MOTION TO MODIFY TEMPORARY ANTI-STALKING ORDER

COMES NOW, the Plaintiff, Capital Pride Alliance, Inc., by and through undersigned counsel, and respectfully moves this Court to modify the Temporary Anti-Stalking Order entered on May 1, 2026, to restore a 100-foot stay-away provision from Capital Pride Alliance's principal offices and to add the Capital Pride Honors Brunch to the list of events Defendant is prohibited from attending. In support of this Motion, Plaintiff states as follows:

1. On May 1, 2026, this Court entered a revised Temporary Anti-Stalking Order. The Order identifies Capital Pride Alliance staff, officers, board members, and related personnel as protected persons, and prohibits Defendant from contacting, attempting to contact, harassing, threatening, or otherwise communicating with any protected person, directly or indirectly.
2. The May 1 Order also permits Defendant to access the DC LGBTQ+ Community Center, which shares space with Capital Pride Alliance's principal offices at 1827 Wiltberger Street

NW, Suite 100, Washington, DC 20001, upon twenty-four hours' notice. The Order states that the notice requirement does not create an affirmative right of entry, that Defendant may not enter or loiter within Capital Pride Alliance workspaces, that Defendant must remain at least twenty-five feet from protected persons, and that Defendant must comply with directives from Center staff.

3. Plaintiff respectfully requests that the Court restore the prior 100-foot stay-away provision from Capital Pride Alliance's principal offices, including the shared premises occupied by the DC LGBTQ+ Community Center.
4. This modification is warranted because information obtained after entry of the May 1 Order undermines the factual basis for Defendant's requested access to the shared premises.
5. Defendant represented to the Court that he regularly accessed and used the DC Center, had been in the building several times, had used the Center during this year and last year, and depended on the Center for services including free produce, free meals, STI testing, laundry, a community library, a cyber center, exercise programs, healing programs, and other community programs.
6. After the May 1 Order was entered, Plaintiff requested that the DC Center review its records to determine whether Defendant had accessed the facility or utilized Center programs or services during the past year.
7. On May 13, 2026, Kimberley Bush, Executive Director of the DC LGBTQ+ Community Center, informed Plaintiff that the DC Center had reviewed the period from May 2025 through April 30, 2026, and "did not identify any documentation indicating that Darren Pasha accessed the Center or utilized Center services during that period."

8. Plaintiff previously notified the Court that Defendant's representations concerning imminent international travel also appear to have been inaccurate. Defendant had represented that he would soon leave the country and remain outside the United States for an extended period during the critical weeks leading up to Capital Pride events. Plaintiff later learned that Defendant remained in the United States and appeared in connection with another court proceeding during the same general timeframe.
9. Plaintiff also notified the Court that Defendant submitted an exhibit purporting to show a direct message from Jose Romero to Defendant. Mr. Romero informed undersigned counsel that the purported message was not authentic and that he had never replied to, communicated with, or initiated contact with Defendant through direct messages, emails, posts, Instagram comments, or otherwise.
10. After Plaintiff filed praecipes concerning Defendant's inaccurate representations and apparently fabricated materials, Defendant sent an email directly to undersigned counsel referencing those filings, urging Plaintiff to accept Defendant's settlement demand and withdraw the complaint, and stating that if counsel ignored the email, Defendant would "see you very soon maybe sooner than you anticipated."
11. Plaintiff submits that Defendant's direct communication to counsel, in the context of this matter and following filings challenging Defendant's representations to the Court, reasonably heightened concerns regarding Defendant's conduct and the disruptive effect of his continued proximity to Capital Pride Alliance's offices.
12. Capital Pride Alliance is presently in the final preparation period for Capital Pride events. During this period, Capital Pride staff, board members, volunteers, contractors, and

community partners are engaged in time-sensitive operational, logistical, security, and public-facing responsibilities.

13. Defendant's presence at or near Capital Pride Alliance's offices during this period would be disruptive, would divert staff and leadership attention from event operations, and would require protected persons and Center staff to manage avoidable safety and compliance concerns inside a shared workplace.
14. Plaintiff therefore respectfully requests that the Court modify the Temporary Anti-Stalking Order to prohibit Defendant from coming within 100 feet of Capital Pride Alliance's principal offices at 1827 Wiltberger Street NW, Suite 100, Washington, DC 20001, including the shared premises occupied by the DC LGBTQ+ Community Center.
15. Plaintiff also requests that the Court add the Capital Pride Honors Brunch at the Four Seasons Hotel, 2800 Pennsylvania Avenue NW, Washington, DC 20007, to the list of events Defendant is prohibited from attending, attempting to attend, or remaining at.
16. The May 1 Order already prohibits Defendant from attending numerous Capital Pride events, including ticketed events, volunteer events, controlled-access areas, and other events where Capital Pride staff, volunteers, board members, and protected persons are expected to be present.
17. The Honors Brunch is a Capital Pride event involving Capital Pride leadership, staff, board members, honorees, invited guests, community partners, and other protected persons.
18. Defendant previously sought to avoid exclusion from the Honors Brunch based on a claimed work-related connection to the Four Seasons Hotel.

19. Plaintiff has reason to believe that Defendant has never worked at the Four Seasons Hotel. Plaintiff does not ask the Court to adjudicate any collateral employment issue, but submits that Defendant's asserted basis for access appears unsupported and is relevant to the Court's consideration of whether Defendant should be excluded from the event.
20. Given Defendant's prior unsupported access-related representations, the presence of protected persons at the Honors Brunch, and the disruptive effect Defendant's attendance would have on Capital Pride staff and leadership, Plaintiff respectfully requests that the Honors Brunch be added to the list of excluded events.
21. Plaintiff requests this modification to preserve the protective purpose of the Temporary Anti-Stalking Order, reduce avoidable disruption during Capital Pride's most operationally sensitive period, and prevent Defendant from using unsupported access claims to place himself in proximity to protected persons.

WHEREFORE, Plaintiff respectfully requests that this Court modify the Temporary Anti-Stalking Order to:

- a. prohibit Defendant from coming within 100 feet of Capital Pride Alliance's principal offices at 1827 Wiltberger Street NW, Suite 100, Washington, DC 20001, including the shared premises occupied by the DC LGBTQ+ Community Center;
- b. prohibit Defendant from entering, attempting to enter, remaining at, or loitering near the DC LGBTQ+ Community Center or any shared portion of the premises at 1827 Wiltberger Street NW, Suite 100, Washington, DC 20001;

- c. add the Capital Pride Honors Brunch at the Four Seasons Hotel, 2800 Pennsylvania Avenue NW, Washington, DC 20007, to the list of events from which Defendant is prohibited from attending, attempting to attend, or remaining; and
- d. grant any other relief the Court deems just and proper.

RESPECTFULLY SUBMITTED BY:

Nick Harrison

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